



United States Environmental Protection Agency  
Region 5  
77 W. Jackson Blvd. Chicago, IL

## **CONVERSATION RECORD**

**Subject:** Inspection of Harsco  
Company at ArcelorMittal  
Plant Number 2

**DATE:** 09/01/11

**TIME:** 10:04 A.M. and 10:19 A.M.

### **PERSON(s) IN**

**CONTACT WITH:** Timothy Jackson, Operations Manager; (219) 392-1405  
Glenn Hundertmark, Environmental Manager; (724) 741-6662

**ORGANIZATION:** Harsco Company

### **TYPE:**

- *Incoming* ()
- *Outgoing* (x)
- *Voice Mail* ()

## **SUMMARY**

I placed a call to Mr. Jackson and identified myself as a U.S. EPA employee. I explained to Mr. Jackson that I needed to conduct an inspection of the Harsco operations at the ArcelorMittal Plant II site, in East Chicago. I explained that it was based on a hazardous waste notification from the Harsco Company. I further explained that I had attempted to conduct the inspection earlier in the week, and was unable to gain access at the time of my arrival, as the security personnel instructed me to contact the Environmental Department, though were unable to provide me with a number to call.

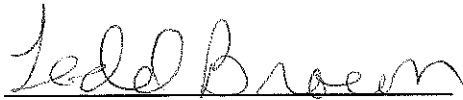
Mr. Jackson provided a very brief description of the operations of Harsco at Plant II, which he described as a scarfing facility and a briquetting facility. He explained that if it was those operations I needed to inspect, I should contact Mr. Glenn Hundertmark at (724) 741-6662.

After my discussion with Mr. Jackson, I called Mr. Hundertmark. I again explained EPA's need to conduct an inspection of the Harsco Company at ArcelorMittal Plant II, and my attempt to have conducted the inspection earlier in the week. I stated I would like to conduct the inspection the next day (Friday, September 2). Mr. Hundertmark explained that he did not think Harsco generated any hazardous waste at the facility, and that the notification was based on a parts

cleaning operation for which they no longer held the contract. I explained I would still need to conduct the inspection of Harsco's operations, since they had notified previously.

Mr. Hundertmark provided me with the names of the site managers for the two on-site Harsco operations. Art Olvera at (219) 399-3488 (for scarffing) and Dave Wollighan at (219) 378-0006 (for briquetting).

Mr. Hundertmark explained he would contact the afore-mentioned gentleman to arrange for the inspection and call me back.



Todd Brown  
Land and Chemicals Division  
U.S. EPA

Date: 9/1/11



## Land and Chemicals Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☒ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action  
☐ Return to Compliance  
☐ NOD Memo to ORC  
☐ Other Correspondence

Facility Name: Harsco Metals

City: East Chicago

State: Indiana

U.S. EPA ID#: IND039061965

Assigned Staff: Todd Brown

Phone: (312) 886-6091

| Name             | Signature                | Date           |
|------------------|--------------------------|----------------|
| Author           | <i>Todd Brown</i>        | <i>10/5/11</i> |
| Regional Counsel | <i>N/A.</i>              |                |
| Section Chief    | <i>Laura M. Jansen</i>   | <i>10/6/11</i> |
| Branch Chief     | <i>P. Z. [Signature]</i> | <i>10-6-11</i> |

NG  
10/6

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make one copy of the contents of this folder for the official file; Note: original inspection report goes into file room.
3. Scan the letter and save the file in the appropriate share drive folder.
4. Mail the original certified mail.
5. Distribute office copies and cc's and bcc's by email.

*Once the certified mail receipt is returned:*

6. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room.
7. E-mail staff the date that the letter was received by facility.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

OCT 06 2011

REPLY TO THE ATTENTION OF:  
LR-8J

Mr. Mike Gibson  
Director of Maintenance  
Harsco Metals Americas  
5222 Indianapolis Boulevard  
East Chicago, Indiana 46312

Re: Compliance Evaluation Inspection  
EPA I.D. No.: IND039061965

Dear Mr. Gibson:

On September 2, 2011, a representative of the U.S. Environmental Protection Agency inspected certain operations conducted by Harsco Metals (Harsco) at ArcelorMittal Plant II, in East Chicago, Indiana. The purpose of the inspection was to evaluate Harsco's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA), specifically, the Standards Applicable to Generators of Hazardous Waste set forth at Title 40 of the Code of Federal Regulations, Part 262, and incorporated by reference at Title 329 of the Indiana Administrative Code, Article 3.1, Rule 7. A copy of the inspection report is enclosed.

Our inspection did not detect violations of the specific RCRA requirements evaluated, as described in the report. Please note that this evaluation is based on observations made by, and information disclosed to, EPA during the inspection. This letter does not relieve Harsco of its obligation to comply with RCRA and other environmental regulations and statutes. EPA will inspect Harsco in the future to ensure compliance as part of federal or state environmental inspection programs.

If you have any questions or concerns regarding this matter, please contact Todd C. Brown, of my staff, at (312) 886-6091.

Sincerely,

A handwritten signature in cursive script, reading "Paul Little", is positioned above the typed name.

Paul Little  
Acting Chief, RCRA Branch  
Land and Chemicals Division

Enclosure

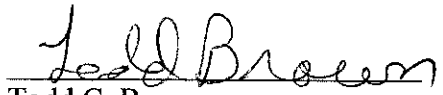
cc: Nancy Johnston ([njohnsto@idem.in.gov](mailto:njohnsto@idem.in.gov)), Indiana Department of Environmental Management

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Harsco Metals Americas  
U.S. EPA ID No.: IND039061965  
LOCATION ADDRESS: ArcelorMittal Plant II  
East Chicago, Indiana 46312  
NAICS CODE: 327992 Ground or Treated Mineral  
and Earth Manufacturing  
DATE OF INSPECTION: September 2, 2011  
U.S. EPA INSPECTOR: Todd C. Brown

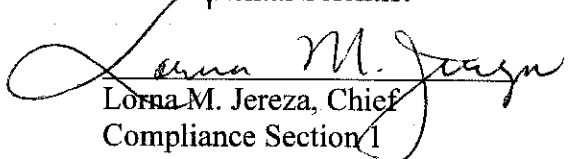
PREPARED BY:

  
Todd C. Brown  
Environmental Scientist

Date

9/7/11

REVIEWED BY:

  
Lorna M. Jereza, Chief  
Compliance Section 1  
RCRA Branch

Date

9/8/11

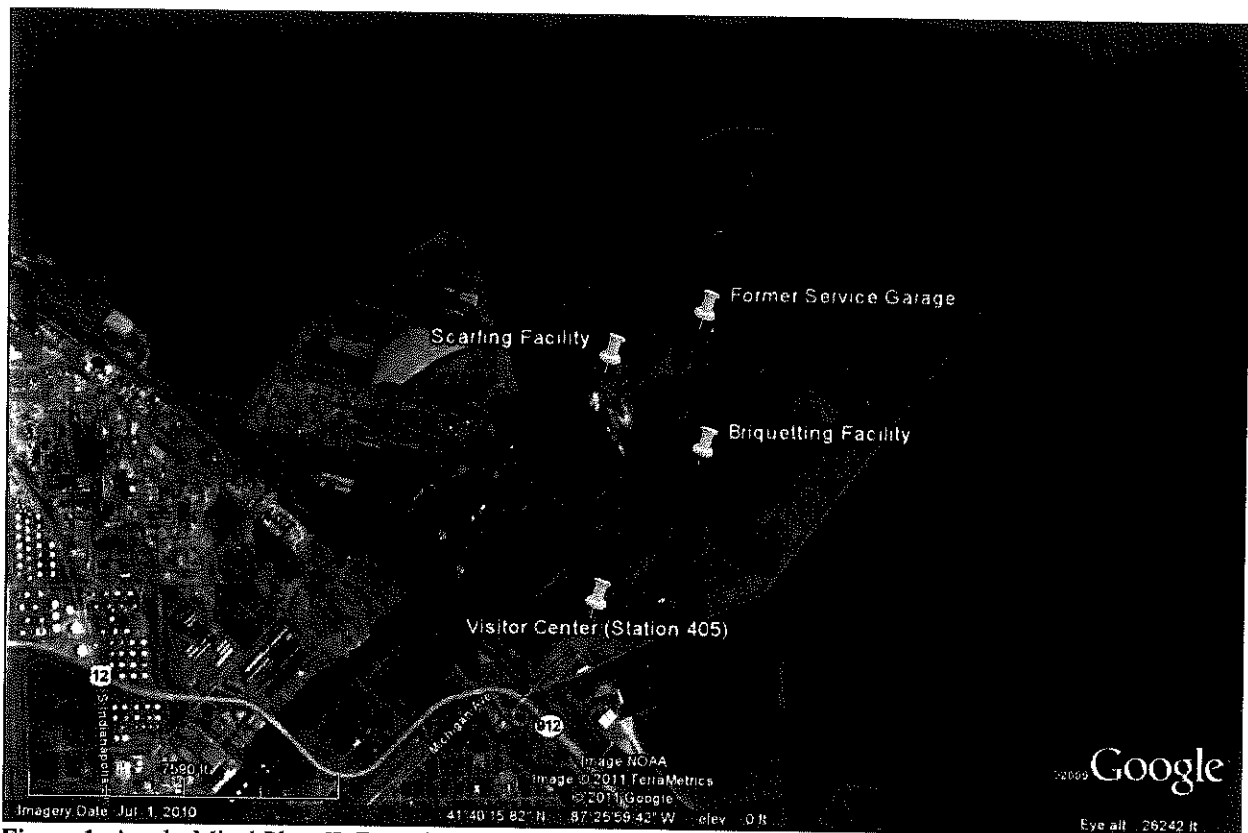
## I. Purpose of Inspection

The purpose of this inspection was to evaluate the compliance of Harsco Metals Americas (Harsco) located at the ArcelorMittal Plant II, in East Chicago, Indiana, with the Resource Conservation and Recovery Act (RCRA), with respect to Harsco's management of hazardous waste.

## II. Plant Description/Back Ground

Harsco operates as a contractor at ArcelorMittal's Plant 2 in East Chicago, Indiana; an integrated steel mill. The current Harsco operations at the plant include a scarfing facility and a briquetting facility. According to Harsco representatives, it had formerly operated a service garage on-site, from which it had generated hazardous waste from a parts washing operation. It was these operations for which Harsco had notified as a hazardous waste generator and obtained an EPA ID number. Harsco has since lost the contract for that operation to Phoenix Services, LLC (Phoenix) and the garage has since been demolished.

An aerial view of the ArcelorMittal Plant II is provided in Figure 1.



**Figure 1:** ArcelorMittal Plant II, East Chicago, Indiana. The red line denotes the approximate boundaries of the plant. The thumb tacks note the approximate position and names of locations visited during the inspection.  
Source: Google™ Earth Pro.

### **III. Note Regarding Entry Attempt on August 30, 2011 and Subsequent Coordination**

I initially attempted to conduct this inspection on August 30, 2011. I arrived at a visitor center located at Station 405 at approximately 10:55 A.M. I presented my credentials and provided a business card to one of the security personnel manning the station. I explained I was on-site to conduct an EPA inspection. I requested to speak with a manager or environmental coordinator. I was informed by the security guard that I would need to contact someone at "environmental" to obtain an entry pass. I requested a phone number of a manager or environmental coordinator to call. I was informed by the security guard that she had none to provide.

After calling colleagues at the U.S. EPA, and noting that the contact number for Harsco currently in my possession (from RCRAInfo) pertained to a number in Pennsylvania, I left the facility. The time was approximately 11:20 A.M.

After returning to the office, I called the afore-mentioned number and found it to be disconnected.

After identifying a current contact at Harsco through research of publicly available files on the Indiana Department of Environmental Management's website, I coordinated an inspection for the day of September 2. The inspection was coordinated through conversations with Harsco employees, Timothy Jackson (Operations Manager), Glenn Hundertmark (Environmental Manager), and Mike Gibson (Director of Maintenance).

### **IV. Arrival on September 2**

I returned to the facility on September 2, 2011, at approximately 9:24 A.M. I met with Mr. Gibson at Station 405 and proceeded to check-in with the security personnel. We then awaited the arrival of Tom Maicher, Environmental Compliance Manager for ArcelorMittal.

I held a brief discussion with Messrs. Maicher and Gibson regarding Harsco's on-site operations and the EPA ID number issued to Harsco for this location. During this conversation it was explained that Harsco had been issued an EPA ID number separate from that of ArcelorMittal. It was also confirmed that Harsco conducts briquetting and scarfing operations on-site, and that the building formerly housing the parts washer, from which hazardous wastes had reportedly been generated, has since been demolished.

At the end of our discussion, I requested to see the location of the former service garage, the Scarfing Facility, and the Briquetting Facility. At that point, Messrs. Gibson and Maicher and I departed in Mr. Gibson's vehicle to tour those operations.



## **V. Tour of Facility Operations**

The locations of the Harsco operations visited during the tour are noted in Figure 1. In order, we visited the site of the former service garage, a nearby office of Phoenix, the Scarfing Facility, and Briquetting Facility. I did not identify hazardous wastes at any of these locations.

Photograph 1 features the location where Harsco's service station had been located. A different garage, operated by Phoenix, is located approximately 100 yards away.

At the Phoenix office, at my request, Mr. Maicher inquired as to whether Phoenix was using the EPA ID number obtained by Harsco, for Phoenix's waste management activities. Mr. Maicher spoke over the phone on this subject with a Mr. Dave Prentis from Phoenix. After his discussion, Mr. Maicher explained he would provide me with the answer after Phoenix followed-up on the request<sup>1</sup>.

At the Scarfing Facility, we met with Arthur Olvera, Operations Manager. Mr. Olvera provided me with an induction briefing and escorted me through the operations. The operation utilizes an Androfer Slab Scarfer, which is a large, natural gas and oxygen-supplied torch used to heat and remove impurities from the surface of steel slabs prior to rolling.

At the Briquetting Facility, we toured the operation with an employee working at the area. The facility is used to process secondary materials, such as mill scale, into briquettes for reintroduction into the steel making process. Incoming materials are dried, mixed with bentonite, and then pressed into charcoal-sized briquettes.

## **VI. Closing Conference**

After the tour, we returned to Station 405. I informed Mr. Maicher that I did not have any compliance concerns to relate at that time. I left the site at approximately 11:26 A.M.

**Attachment:** Inspection Photographs

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<sup>1</sup> On September 2, 2011, I received a voice-mail from Mr. Maicher in which he explained that Phoenix did not obtain an EPA ID number and used a "non-hazardous" parts washer fluid manufactured by Safety Kleen.

**Inspection Photographs: Harsco Metals at ArcelorMittal Plant II, East Chicago, Indiana  
(IND039061965)**

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**Photo Number** 1

**Photo Filename** DSCN0164.jpg

**Date/Time** 9/2/2011  
10:20:04 AM

**Photographer** Todd C. Brown

**Description**

Location of the former service garage operated by Harsco Metals at ArcelorMittal Plant II in East Chicago, Indiana. The building has since been demolished.

